

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-05				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1			Title of Work Assignment/SF Site Name Eval of Industrial Dischargers				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2013 To 09/25/2014				
Comments: Work shall not commence on this work assignment until September 26, 2013.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
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5										
Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 09/26/2012 To 09/25/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee: LOE:										
Cumulative Approved: Cost/Fee: LOE:										
Work Assignment Manager Name William Swietlik <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number 202-566-1129 FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 1-05**

Title: Evaluating Categories of Industrial Dischargers for Potential National Regulations

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Period of Performance: September 26, 2013 through September 25, 2014

Introduction:

The 1972 Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams (termed “effluent guidelines”) or to sewage treatment plants¹ (termed “pretreatment standards”). The Act also directs EPA to develop national regulations for new industrial facilities (termed “new source performance standards”).

An additional critical component of the Act is that it requires EPA to periodically study and review existing effluent guidelines, pretreatment standards, and standards of performance for new sources and consider the need to develop regulations for industries not covered by a national regulation. These planning requirements are found in several sections of the Clean Water Act (CWA). Section 304(m) provides for an effluent guideline plan that contains three basic elements to be published on February 4, 1987 and biennially thereafter.

¹Also referred to as publicly owned treatment works or POTWs.

First, EPA must establish a schedule for the annual review of existing effluent guidelines promulgated under Section 304(b), (i.e., limitations for existing direct dischargers) and for annual revision of the guidelines if appropriate (see Section 304(m)(1)(A)). Second, EPA must identify categories of sources that directly discharge toxic or non-conventional pollutants for which EPA has not published effluent limitations guidelines or new source performance standards (see Section 304(m)(1)(B)). Third, EPA must set a schedule for the establishment of national regulations for any categories identified in the second step, with a final promulgated regulation three years after identification in a national plan (see Section 304(m)(1)(C)).

For indirect dischargers, Section 304(g) requires EPA to review at least annually and, if appropriate, revise the pretreatment standards EPA has promulgated under CWA Section 307. In addition, Section 307(b) provides that EPA must promulgate pretreatment standards for categories of sources not subject to existing pretreatment standards if there is pass-through or interference at POTWs. As good government practice, EPA publishes the findings of its annual reviews of direct and indirect dischargers together in one document, the “Effluent Guidelines Program Plan.” EPA publishes a preliminary Plan in odd-numbered years and publishes a final Plan in even-numbered years after public review on the preliminary Plan.

Under this work assignment, ERG will provide technical support to EPA in conducting its Section 304/307 annual review of existing effluent guidelines and standards and identifying and evaluating new sources of wastewater discharges. In addition, ERG will provide support to EPA with the following tasks:

- Develop a work plan and provide bi-monthly and monthly progress reports;
- Develop an electronic schedule compatible with Microsoft Project;
- Develop a revised annotated timeline for guiding the 2014 annual review and developing the 2012 Final Effluent Guidelines Program Plan and 2014 Preliminary Plan;
- Prepare quarterly Quality Assurance reports;
- Provide technical support to EPA in evaluating industrial facilities or categories;
- Provide technical support to EPA for briefings and for public and industry outreach activities; and,
- Provide technical support to EPA for Section 304 activities, preparing and maintaining a record, and drafting support documents.

During this work assignment, ERG will provide the following deliverables to EPA:

- Work plan and cost estimate;
- Bi-monthly and monthly progress reports;
- Any necessary revisions to the existing QAPP, if required by EPA;
- Quarterly Quality Assurance reports;
- Detailed Investigations on Specific Industries Identified by EPA;
- Analysis supporting Section 304 effluent guidelines review activities;
- Docket materials; and,

- Quick turnaround tasks.

General Work Assignment Requirements:

Deliverable Formatting and Terminology. Throughout this Work Assignment, ERG shall provide draft and final reports to EPA in electronic and hard copy formats. The EPA WAM and contractor will use the terminology in this work assignment to improve the deliverable review process. See Attachment A. ERG shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA Work Assignment Management (WAM) prior to file preparation. The EPA WAM will identify for ERG which documents will be posted on EPA's Effluent Guidelines webpage (<http://epa.gov/guide/304m/index.html>). These documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant.² For planning purposes, ERG should assume that the following documents will be posted to EPA's Effluent Guidelines webpage: (1) the Annual Review Report for the 2012 and the 2013 reviews, the Preliminary 2014 Effluent Guidelines Program Plan ("2014 Prelim. Plan"); the final 2012 Plan and (2) User's Guides for the dockets for the Preliminary 2014 Prelim. Plan and Final 2012 Plan.

Travel. EPA anticipates a limited need for non-local travel by contractor employees and/or subcontractors to support the scope of this work assignment (e.g., site visits and sampling activities, attending public meetings, attending scientific/technical conferences). ERG will provide specific travel details and costs in a request for travel approval submitted for WAM review and Project Officer (PO) signature before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information. ERG will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. ERG will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans. See Task 9 for more details.

Identification as Contracting Staff. To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public ERG should refer all interpretations of policy to the EPA WAM.

Limitation of Contractor Activities. ERG will submit drafts of all deliverables to the EPA Work Assignment Manager (WAM) for review prior to submission of the final product. ERG will incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. ERG will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.

² See <http://www.epa.gov/epahome/accessibility.htm>.

Deliverables. Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

Deadlines. For the purpose of developing the work plan, ERG shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Based upon past experience with the 304(m) planning process, any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the EPA WAM, PO, or relevant task manager will change the deliverable deadlines through written technical direction. The EPA WAM/PO/TM also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance. The following table provides a summary of the Agency milestones.

Major Milestones
Publication of the Final 2012 Plan
Publication of the 2012 Annual Review Report (ARR)
Publication of the 2013 ARR
Publication of Preliminary 2014 Plan
Conducting the 2014 Annual Review

Conferences, Meetings and Other Events: No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Tasks:

Task 1 – Program Management:

ERG shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. ERG shall also estimate direct costs such as travel, computer costs, typing, etc.

ERG shall provide electronic copies of the monthly progress reports to the EPA WAM and PO. Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties.

In addition to the monthly progress reports, ERG shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the EPA WAM, EPA PO, and task managers. The monthly and mid-monthly status reports shall list the following information by task: budgeted LOE for each task, summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report.

ERG will prepare an annotated timeline for completing the 2012 Final ARR, the 2013 annual review and 2012 Final Plan and for preparing the Prelim. 2014 Effluent Guidelines Program Plan and conducting the 2014 annual review. This annotated timeline will describe the major elements of developing these materials or conducting these investigations from beginning to end and their timing and LOE. The EPA WAM will use the timeline to identify all major project tasks, track the project's progress, and coordinate all aspects of the project. ERG will update and revise the annotated timeline as needed. The timeline will be used by EPA to help get the 304m planning process back on statutory schedule.

TASK 1 – DELIVERABLES	
Deliverable	Deadline
Work Plan	• In accordance with contract requirements
Progress Reports	• Monthly
Mid-Monthly Reports	• Mid-monthly and monthly
1 st Draft - Draft Annotated Timeline	• 45 days from issuance of work assignment
2 nd Draft - Draft Annotated Timeline	• 14 days from receipt of EPA WAM comments
1 st Draft - Electronic Schedule (compatible with MS Project)	• 45 days from issuance of work assignment
2 nd Draft - Electronic Schedule (compatible with MS Project)	• 14 days from receipt of EPA WAM comments

Task 2 – Quality Assurance:

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1A2 and implementing guidance CIO-2105-P-01-0. All projects that involve the generation, collection, analysis and use of environmental data must have an approved QAPP to assure the quality, objectivity, integrity and utility of the data and information used in the project.

QA Project Plan Requirements

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) or Programmatic Quality Assurance Project Plan (PQAPP) be in place for work that involves the collection, generation, evaluation, analysis or use of primary environmental data. The QAPP or PQAPP defines and documents how specific data generation and collection activities shall be planned, implemented, and assessed during a particular project. This contract has an approved PQAPP for all necessary work envisioned under this work assignment.

ERG shall adhere to the approved PQAPP when generating, collecting and determining the use of data and information for any applicable task under this work assignment. Specifically, Sections 3 and 4 of the ERG PQAPP apply to the collection and analysis of secondary (existing) data under this work assignment. Sections 7-10 and section 12 are also applicable to this work assignment. No primary data collection or analysis is envisioned under this work assignment. If any work required under this work assignment is not covered under the PQAPP, then ERG shall prepare a Supplemental QAPP (SQAPP) for those tasks.

TASK 2 - DELIVERABLES	
Deliverable	Deadline
SQAPP	• 10 days after notification by the WAM and or QAC that an SQAPP is needed.
Revisions based on EPA feedback	• 7 days after receipt of EPA feedback.
Final SQAPP for this Work Assignment	• 5 days after EPA feedback
PQAPP/SQAPP progress reports	• Monthly

Task 3 – Completion of 2012 Annual Review Report (ARR):

ERG shall support EPA in completing the 2012 304m Annual Review Report (ARR). ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2012 ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts.

ERG shall also finish assembling all information for the public and confidential records for the 2012 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any Federal Docket Management System (FDMS) requirements.

TASK 3– DELIVERABLES	
Deliverable	Date
Complete the 2012 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WAM.
Provide the WAM with a final draft of the 2012 ARR	• According to a schedule developed by ERG and approved by the WAM.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.
Provide the Final 2012 Annual Review Report	• According to a schedule developed by ERG and approved by the WAM.

Task 4 -- Preparation and Publication of the 2012 Final Plan:

ERG shall support EPA in writing and completing the Final 2012 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Final 2012 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Final Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan. ERG shall provide all necessary support to compile address and respond to all public comments from the Preliminary 2012 Plan.

ERG shall also finish assembling all information for the public and confidential records for the Final 2012 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 4 – DELIVERABLES	
Deliverable	Date
Draft the Final 2012 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.
Provide the WAM with a draft of the Final 2012 Plan	• According to a schedule developed by ERG and approved by the WAM.
Compile, address and respond to all public comments from the Preliminary 2012 Plan	• According to a schedule developed by ERG and approved by the WAM.
Respond to WAM/reviewer comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.
Provide the Final 2012 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.

Task 5 – Completion of the 2013 Annual Review and Preparation of the 2013 Annual Review Report (ARR):

ERG shall support EPA in completing the 2013 304m annual review and in preparation of the 2013 Annual Review Report (ARR). The 2013 annual review is to be completed using the Toxicity Ranking Analysis (TRA) based on DMR and TRI data and information. ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2013 annual review and the ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts.

ERG shall also finish assembling all information for the public and confidential records for the 2013 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 5 – DELIVERABLES	
Deliverable	Date
Complete the 2013 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WAM.
Provide the WAM with a final draft of the 2013 ARR	• According to a schedule developed by ERG and approved by the WAM.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.
Provide the Final 2013 Annual Review Report	• According to a schedule developed by ERG and approved by the WAM.

Task 6 - Preparation and Publication of Preliminary 2014 Plan:

ERG shall support EPA in preparing the Preliminary 2014 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Prelim. 2014 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Prelim. Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan.

ERG shall also finish assembling all information for the public and confidential records for the Prelim. 2014 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FMDS requirements.

TASK 6– DELIVERABLES	
Deliverable	Date
Draft the Prelim. 2014 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.
Provide the WAM with a draft of the Prelim. 2014 Plan	• According to a schedule developed by ERG and approved by the WAM.
Respond to WAM/reviewer comments and necessary revisions to the Prelim. 2014 Plan	• Within 10 working days after being provided by the WAM.
Provide the final draft of the Prelim. 2014 ELG Plan ready for publication	• According to a schedule developed by ERG and approved by the WAM.

Task 7 - Design and Conduct of the 2014 Annual Review:

ERG shall provide all necessary support to EPA in designing and conducting the 2014 annual review. The 2014 annual review will be an "even year" review relying on new and additional sources of hazard information in lieu of conducting the TRA. EPA anticipates that nanomaterials will constitute a significant portion of the hazard information considered in the annual review, along with any others agreed upon by ERG and the WAM. ERG shall provide to the WAM an annotated outline of the approach, methodologies and data sources that will be investigated.

ERG shall provide EPA a plan and schedule for the 2014 annual review (which can be a part of the annotated timeline described above). ERG shall assemble all necessary supporting documentation, data and information for the 2014 annual review. ERG shall ensure all data sources for the 2014 annual review is covered by the PQAPP, or if needed, an SQAPP.

ERG shall also assemble all information for the public and confidential records for the 2014 annual. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FMDS requirements.

TASK 7– DELIVERABLES	
Deliverable	Date
Design and conduct the 2014 annual review	• According to a schedule developed by ERG and approved by the WAM.
Identify new and additional sources of hazard data	According to a schedule developed by ERG and approved by the WAM.
Provide the WAM with an annotated outline of the 2014 annual review	• According to a schedule developed by ERG and approved by the WAM.
Provide to the WAM a schedule for the 2014 annual review	• Within 10 working days after being provided by the WAM.
Assemble all necessary supporting data and information	• According to a schedule developed by ERG and approved by the WAM.

Task 8 – General Effluent Guidelines Implementation Support and Technical Support:

ERG shall provide technical support for the implementation of existing effluent guidelines rulemakings. Specifically, ERG will help with the preparation of guidance documents supporting the implementation of the existing effluent guidelines. For planning purposes ERG should assume six (6) technical memos supporting existing effluent guidelines. Preparation of these six (6) technical memos will likely involve the review of current permits and fact sheets, DMR data, and other facility specific information.

ERG will provide technical support to the EPA in responding to inquiries from other EPA offices, stakeholders, and permitting authorities in implementing existing effluent guidelines. For planning purposes ERG should assume twelve (12) requests of varying effort will be required by EPA during the period of performance.

ERG will prepare materials identified by the EPA WAM through written technical direction to support Agency briefings as well as EPA's 304(m) outreach activities to the public and to industry. These materials may include presentations, reports, brochures, leaflets, and posters.

ERG shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WAM or PO with relevant information to be used in the Agency's response to the FOIA) as directed in writing by the WAM or PO. For purposes of the workplan, ERG shall assume that it will support three FOIA requests and three briefings.

ERG may be required to attend outreach activities or ship materials on a case-by-case basis as required by the EPA WAM's technical direction. ERG will submit detailed plans and approaches upon receipt of technical direction from the EPA WAM. ERG will submit materials to EPA for review and approval prior to their implementation. When conducting outreach activities, ERG personnel will clearly identify themselves as contractor employees both orally and via the use of identification badges. Typically ERG will be required to provide products within two weeks or less.

TASK 8 – DELIVERABLES	
Deliverables	Deadline
Six Technical Memos Supporting Existing Effluent Guidelines	• By written technical direction.
Twelve (12) Technical Support Actions For EPA Offices, Stakeholders, And Permitting Authorities In Implementing Existing Effluent Guidelines	• By written technical direction.
Presentations, Reports, Brochures, Leaflets, And Posters	• By written technical direction.

TASK 8 – DELIVERABLES	
Briefing / FOIA Support	<ul style="list-style-type: none"> • Requests to be supplied within 14 days

Task 9- CBI Procedures:

During the course of the work assignment, ERG will be accessing and evaluating CBI. As such, ERG shall adhere to EPA's CBI policy and procedures as described in the contract statement of work, Section 1.2. ERG must maintain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements and 70 FR 9070; February 24, 2005). ERG will not disclose any CBI to anyone other than EPA without prior written approval from the EPA WAM. ERG shall utilize CBI information in accordance with contract requirements and limitations to include using the “Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan,” dated August 1, 2011 or its successor approved plans.

TASK 9 – DELIVERABLES	
Deliverable	Deadline
A CBI program in compliance with the requirements of the contract and the requirements of ERG’s CBI Plan.	<ul style="list-style-type: none"> • Ongoing

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Comments: This Work Plan Approval incorporates a LOE ceiling of 4,350 hours and a funding ceiling of \$420,000.00. The contractor shall not exceed these thresholds without written authorization from the Contracting Officer.										
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Contract Period:		Cost/Fee: \$0.00		LOE: 0						
09/26/2012 To 09/25/2014										
This Action:		\$512,816.00		5,589						
Total:		\$512,816.00		5,589						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 10/24/2013		Cost/Fee: \$512,816.00		LOE: 5,589						
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This Action:				\$104,233.00				1,000		
Total:				\$617,049.00				6,589		
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Phone: 202-566-1058
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E-mail: lewis.samantha@epa.gov

Period of Performance: March 27, 2014 through September 25, 2014

Introduction:

This amendment is adding one new task and additional LOE to the work assignment for the new task. All other provisions of the original work assignment apply to this new task.

New Task:

Task 10 – Petroleum Refinery Preliminary Study:

ERG shall support EPA in conducting a Preliminary Study of the petroleum refinery industry. ERG shall develop a stand-alone report summarizing the following information:

- Updated profile information from 2004 study, with more detailed information on processes of interest:
 - Catalytic cracking – Potential source of dioxin
 - Air pollution control – Potential new wastewater stream;

- Description of new feedstocks, facilities processing feedstocks, and potential impact on water discharges;
- Identification of new treatment technologies of interest (from treatment technology database);
- Identification of pollution prevention techniques;
- Identification of data gaps and next steps for study, including a summary of economic and environmental assessment data that may be needed for a detailed study of the industry.

TASK 10 – DELIVERABLES	
Deliverable	Deadline
Work Plan	• In accordance with contract requirements
Provide the WAM with a draft of the Petroleum Refinery Detailed Study	• August 15, 2014
Respond to WAM/reviewer comments and necessary revisions to the Detailed Study	• Within 10 working days after being provided by the WAM

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014			Title of Work Assignment/SF Site Name				
			Base Option Period Number 1			Eval of Industrial Dischargers				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval					Period of Performance From 09/26/2013 To 09/25/2014					
Comments: This Work Plan Approval incorporates Amendment 1.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$512,816.00		LOE: 5589						
09/26/2012 To 09/25/2014										
This Action:		\$104,233.00		1,000						
Total:		\$617,049.00		6,589						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 04/09/2014		Cost/Fee: \$104,233.00		LOE: 1,000						
Cumulative Approved:		Cost/Fee: \$617,049.00		LOE: 6,589						
Work Assignment Manager Name William Swietlik						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number 202-566-1129				
						FAX Number:				
Project Officer Name Meghan Hessenauer						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 202-566-1040				
						FAX Number:				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name Brad Heath						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2352				
						FAX Number:				

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-29				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1			Title of Work Assignment/SF Site Name Steam EEG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2013 To 09/25/2014				
Comments: Work shall not commence on this work assignment until September 26, 2013.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name Ronald Jordan <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number 202-566-1003			
							FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 1-29**

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Ronald Jordan

Alternate Work Assignment Manager: Jezebele Alicea-Virella

Task Manager (Task 4): William Swietlik

Period of Performance (POP): September 26, 2013 through September 25, 2014

I- Purpose:

The purpose of this work assignment is to guide the contractor identifying tasks that need to be performed to provide regulatory support to EPA in the development of effluent limitations guidelines and standards for the steam electric power generating point source category (40 CFR Part 423).

II- Introduction:

The Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams or to sewage treatment plants. This work assignment supports EPA's development of effluent limitations guidelines and standards (collectively referred to as ELGs) for the steam electric power generating point source category (40 CFR Part 423).

Key tasks under this work assignment include:

- Technical support in planning and scoping rulemaking activities for the final rule;
- Update analyses performed for proposed rule to address public comments received during comment period:
 - analyzing new data that is submitted, as well as reassessing data collected by the industry questionnaire and other sources;
 - characterization of steam electric power plant facilities, operations, and wastewater discharges;
 - evaluating wastewater sampling data collected during EPA sampling episodes or industry self-monitoring activities, including assisting EPA's development of numeric effluent limitations;
 - evaluating the treatability of high concentrations of dissolved mercury;

- estimating the cost for installing pollution control technology or implementing process changes, quantifying associated pollutant reductions, and evaluating environmental improvements associated with regulatory control options.
- Preparing technical support documents and memoranda describing the technical analyses, including the methodologies used and results, conducted to support EPA's regulatory options for final revisions to effluent guidelines;
- Compiling and organizing the rulemaking record for final regulations, including associated docket preparations.
- Compiling and organizing public comments received during public comment period of proposed rule, and assisting with the review of comments and the development of written technical responses to the comments.
- Evaluate technical data submitted in comments and revise technical methodology and analyses, as appropriate.
- Providing technical support for site visits and other activities, including public meetings and outreach.

II- General Work Assignment Requirements (PWS Section 3.0)

Deliverable Formatting and Terminology

Throughout this work assignment, the contractor shall provide draft and final reports to EPA in electronic format, with hard copy format also provided when directed by the work assignment manager. The EPA WAM and contractor will use the terminology defined in Attachment A to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA WAM prior to file preparation. The EPA WAM will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage (http://water.epa.gov/scitech/wastetech/guide/steam_index.cfm). These documents posted to the Effluent Guidelines webpage must be Section 508 compliant.¹

Travel

Non-local travel by the contractor employees and/or subcontractors will be required to support the scope of this work assignment (e.g., site visits and public meetings). The contractor shall provide specific travel details and costs in a request for travel approval by the EPA WAM and the EPA Project Officer (PO) before each trip occurs (as specified by the contract per clause H.32).

Event Expenses Not to Exceed \$20,000

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training

¹ See <http://www.epa.gov/epahome/accessibility.htm>.

that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Confidential Business Information

During the course of the work assignment, the contractor will be accessing and evaluating CBI. The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the "Security Plan for Handling Confidential Business Information Under the Clean Water Act" (September 2002) or its successor approved plans.

Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the EPA WAM.

Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the EPA WAM for review prior to submission of the final product. The contractor shall incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. The contractor will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.

Deliverable Due Dates

For the purpose of developing this work plan, the contractor shall assume the deliverable due dates in the tables for each task presented further. Major technical deliverables shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

III- Tasks

Task 1 – Program Management (PWS Section 3.0)

The contractor shall develop a detailed work plan that outlines the approach and methodology

necessary for each task identified in this work assignment. The workplan shall specify the necessary steps for each task; list of the personnel projected to participate; direct and indirect costs such as labor, travel, and sampling supplies; and estimated hours and budget by task and deliverables to complete this work assignment. The workplan shall be submitted to the EPA PO and EPA WAM by 15 days after WA receipt.

The contractor shall prepare and submit electronic monthly progress reports to the EPA WAM and EPA PO. This progress report will document the costs incurred and work performed during the previous accounting period, and the work planned for the current accounting period.

In addition to a monthly progress report, the contractor shall prepare mid-monthly and monthly status summaries to the EPA WAM and EPA PO. The mid-monthly and monthly status reports shall list the following information by task: summaries of costs and LOE expended for the reporting period; a table of hours by personnel for each task; and the cumulative hours (LOE) and dollars (and the percentage of each) expended for each task. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report. These reports and summaries shall use a format similar to that used by the contractor to report such information for WA 0-29. The contractor shall inform the EPA CO, PO and WAM in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

TASK 1 – DELIVERABLES	
Deliverable	Due Date
Work Plan	In accordance with contract requirements
Monthly Progress Reports	Monthly
Monthly & Mid-monthly Status Summaries	Mid-monthly and monthly

Task 2 – Quality Assurance (PWS Section 3.0)

Tasks included in this work assignment are continuing work for the steam electric effluent guidelines regulatory support approved under WA 9-29 of a previous contract (68-C-02-095) and under previous WA 0-29 of current contract (EP-C-12-021). A copy of the latest version of the approved QAPP revision 4 is included in this package. See Attachment B for effluent guidelines development process.

In this WA the contractor shall continue tasks as approved in the previous option period QAPP and according to sections (2.3.3, 2.4, 2.7, 2.8, 4, 6, 7, 8, 10, 11, 12) of the programmatic QAPP that are applicable to this WA.

2.1 Background

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of

environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. Examples of these environmental data operations are provided in **Table 1-1** below.

Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data

Item	Examples
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

Note that QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

2.2 QA Project Plan Requirements

The Contractor prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary” use of data). However, EPA has determined that the Contractor is operating under the existing PQAPP and that the PQAPP addresses QA requirements for this work assignment. In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe: Specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support effluent limitations and guidelines industry rulemaking:

- using existing sources of data to perform analyses in support of the Steam Electric Industry Effluent Guideline Study
- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA data bases—as well as a rationale for when those databases are appropriate and what data available in each will support the project
- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

2.3 Additional QA Documentation Required

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes. For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data. Upon receipt, the EPA WAM will review each applicable report and certify whether the Contractor has adhered to the QA requirements documented in the Contractor's PQAPP.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial/technical progress report.

2.4 Data Quality Act/Information Quality Guidelines Requirements

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data

and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA’s *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency* (EPA/260R-02-008, October 2002), referred to as “EPA’s Information Quality Guidelines,” describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA’s Information Quality Guidelines indicate that “especially rigorous robustness checks” should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the EPA WAM can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the EPA WAM, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the EPA WAM shall notify the Contractor through written technical direction.

TASK 2 – QA DELIVERABLES	
Deliverable	Due Date
Monthly Reports of QA work performed (may be included in the Contractor’s monthly progress report)	Monthly throughout the WA period of performance

Task 3 – Industry Profile, Wastewater Characterization, and Treatment Technology Evaluations (PWS Section 3.1, 3.2, 3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5, 4.0)

During a previous option period, the contractor collected and analyzed information necessary to develop effluent guidelines regulations for the steam electric power generating point source category proposed rule. In this WA, contractor shall continue necessary tasks after proposal to update information used to determine the industry profile.

Site Visits:

The contractor shall prepare for, participate in and document facility site visits. At the direction of the EPA WAM, the contractor shall support EPA in identifying appropriate plants at which to

conduct site visits and will assist in identifying site visit objectives and questions. The need of potential site visits will be determined according to comments received during the proposed rule comment period.

The contractor shall provide draft reports of each site visited to the EPA WAM for review. Once the EPA WAM's comments are incorporated, the contractor shall provide the EPA WAM with a revised draft report to send to the facility contact for review and comment. The contractor shall incorporate facility comments and finalize the report for inclusion in the administrative record. If the facility has claimed "Confidential Business Information" (CBI), the contractor shall prepare a sanitized version of the report for the public record.

EPA will use site visit information, sampling data, industry survey data, and other sources gathered under WA 0-29 (and previous work assignments during the steam electric ELG rulemaking) to continue work on the following subtasks. The contractor shall continue work on subtasks for the final rule and as public comments are received from the proposed rule, the contractor shall revise information as appropriate to support revisions of the ELGs. Under this work assignment contractor shall provide technical support for:

- Characterize Pollutant Discharges:
The contractor shall continue work performed under previous WA 0-29 and update any information according to comments received after proposal. As part of this effort, the contractor shall participate in the International Water Conference (Orlando, Florida) in November 2013 to obtain newly-released information on the state-of-the-art treatment for FGD and coal gasification wastewaters.
- Industry Profile:
The contractor shall update EPA's profile of the steam electric industry. The profile shall be updated to include relevant information provided during the proposed rule comment period for fossil- and nuclear-fueled steam electric power plants, specifically the coal-, oil-, and petroleum coke-fired plants/units with wet FGD systems and wet ash handling practices.
- Analyses of Industry Survey Data:
The contractor shall continue to provide technical assistance in reviewing industry responses to an information collection request (also referred to as ICR or questionnaire) for the steam electric power generating industry as EPA continues efforts to develop revised effluent guidelines after proposed rule comments are received. During previous WA 0-29, the contractor provided data summaries and analyses based on questionnaire data, as well as developed national estimates and other descriptive statistics. In this WA, the contractor shall perform related tasks based on written technical direction from the EPA WAM.
- Technology and Process Change Evaluations:
The contractor shall continue work performed under previous WA 0-29 which includes providing technical assistance in identifying and evaluating candidate pollution control technologies for power plant wastewater, particularly emerging technologies. The technology assessments shall include a review of relevant processes for removing selenium, bromides, and mercury. The technology assessment shall also investigate the significance of oxidation-reduction potential (ORP) changes in FGD scrubbers to affect wastewater pollutant

concentrations and treatability, and identify mechanisms for plants to monitor and control scrubber ORP. The contractor shall also assist in reviewing data associated with a study evaluating the treatability of FGD wastewater containing high concentrations of dissolved mercury.

- Calculate Compliance Costs and Pollutant Reductions for Regulatory Options:
During WA 0-29, the contractor estimated facility-level and industry-level costs for facilities to comply with candidate regulatory options, and quantified the facility-level and industry-level pollutant reductions that would result from installing pollution controls. In this WA the contractor will take calculated loads and costs for the proposed rule and reanalyze them based on the comments received during the comment period or from other sources during the proposed regulation review process. These cost and pollutant reductions estimates may be determined on an individual facility-specific basis, or they may be evaluated using a set of prototype facilities and then using these results to estimate total industry values. Finally, the contractor shall document its revised loadings methodologies and calculations.
- Prepare Technical Development Document and Supporting Documentation:
The contractor developed under previous WA 0-29 technical development document and supporting documentation that summarized the key data collection and analysis activities for the effluent guidelines proposed rule. In this WA the contractor shall begin drafting sections for the final TDD and supporting documentation for the effluent guidelines final rule where comments received during proposal are addressed. The TDD shall include descriptions of EPA's wastewater sampling program, the industry survey, site visits, industry self-monitoring data, treatment technologies, industry profile, wastewater characteristics, regulatory options, compliance cost and pollutant reduction estimations, and non-water quality environmental impacts.

TASK 3 – DELIVERABLES	
Deliverable	Due Date
<ul style="list-style-type: none"> • First draft of site visit reports (if any site visit is needed) • Revised draft of site visit reports • Final site visit reports • “Sanitized” site visit reports 	<ul style="list-style-type: none"> • Within 3 weeks after the site visit • Within 3 weeks following receipt of comments from EPA WAM review • Within 3 weeks following receipt of facility comments • Two weeks after delivery of final site visit report, if required by CBI concerns

TASK 3 – DELIVERABLES	
Deliverable	Due Date
Draft facility-level and industry-level compliance costs and pollutant reductions for option selection analyses	Sept 4, 2014
Assessment of emerging pollution control technologies	March 31, 2014
Profile updates and analyses of industry survey data	January 31, 2014
Initial Draft TDD for Final Rule	August 31, 2014

Task 4 - Environmental Engineering Analyses (PWS Sections 3.4, 3.4.1, 3.5)

The contractor shall continue work provided under WA 0-29. In this WA the contractor shall provide all necessary technical and scientific support to EPA to finalize the environmental assessment (EA) and benefits analysis of the steam electric effluent limitations guidelines. This includes the analysis of the potential revised/improved environmental assessment methodologies used for the proposed rule, implementing improvements to the EA as decided upon by the WAM, organizing and responding to comments provided for proposed rule. The contractor shall aid in the development of technical supporting documents for final rule and develop a draft environmental assessment report. The contractor shall cooperatively participate on the Contractor(s) - EPA Team supporting the environmental engineering and benefits analysis work. Under this work assignment contractor shall work on the following subtasks:

- Conduct new/improved analyses or EA methodologies as directed by the WAM in support of the final ELG rule.
- Implement new and improved EA methodologies as directed by the WAM.
- Run additional/revised water quality model runs, if directed by the WAM, to support the final regulatory option or to fulfill harmonization with the ORCR CCR rule.
- Determine national scale power plant pollutant impacts on estuarine and marine waters, if feasible, and if directed by the WAM.
- Assist in preparing preamble, rule language and technical support materials for final rule.

- Provide support on response to comments on environmental impacts/environmental improvements and other EA issues for the final rule.
- Work cooperatively with the economics analysis team to provide all necessary endpoints, data and information to conduct the benefits analyses to support the final rule.
- Continue to review and analyze ORCR eco-risk assessment work on the ORCR CCR rule, and other tools and products as directed by the WAM to assess quality, accuracy, consistency and comparability of the final steam electric environmental assessment work.

TASK 4 – DELIVERABLES	
Deliverable	Due Date
Review and analyze ORCR risk assessment work and incorporate any necessary improvements to EA work.	Ongoing during period of performance
Conduct new/improved analyses or EA methodologies as directed by the WAM in support of the final ELG rule.	TBD by WAM
Implement new and improved EA methodologies as directed by the WAM.	TBD by WAM
Run additional/revised water quality model runs, if directed by the WAM, to support the final regulatory option and/or to fulfill harmonization with the ORCR CCR rule.	TBD by WAM
Determine impacts on estuarine waters, if feasible	TBD by WAM
EA analyses reports to support option selection.	September 15, 2014
Prepare preamble and rule EA language and technical support materials.	September 15, 2014
Submit draft revised SE- EA report and supporting documents	September 15, 2014

Task 5 – Coordination/Harmonization of ELG and CCR Analyses (PWS Section 3.4, 3.4.1, 3.4.2, 3.4.3, 3.5, 3.6)

The contractor shall estimate the incremental compliance costs, pollutant reductions, and other environmental effect measures for revisions to the steam electric ELGs, relative to full implementation of a CCR rule. The contractor shall use for this analysis information provided by the EPA WAM, along with information prepared by ORCR and its contractors for the CCR rule. Such analyses shall evaluate the degree to which CCR rule implementation will trigger facility actions that eliminate or reduce ELG compliance costs, and how CCR implementation will affect pollutant reductions and other measures of environmental improvement that would be achieved by final ELG revisions.

TASK 5 – DELIVERABLE	
Deliverable	Due Date
Incremental compliance costs & pollutant removals (ELG relative to CCR)	September 4, 2014

Task 6 – General Technical Support (PWS Section 3.0, 3.5, 3.6)

Using information provided by the EPA WAM, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses related to power plant discharges as directed by the EPA WAM through written technical direction. Much of the information used is expected to be an outgrowth of data collected under the other tasks of this work assignment. The tasks may include work such as support in preparing or gathering data for presentation at technical meetings, summarizing data to brief management on aspects of power plant operations, or preparing materials and participating in meetings, conferences and workshops to support EPA's outreach activities to the public, industry, and regulatory authorities. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there will be approximately ten written technical directives.

In addition, the contractor shall provide technical support as directed by the WAM to support permit authorities during permits review process and its implementation. The contractor shall provide technical support, such as revised engineering data based on comments received during proposed rule, which may be required to aid in the development of the initial draft and final economic impact analysis report for the final rule.

TASK 6 – DELIVERABLE	
Deliverable	Due Date
General technical support (as described	By written technical direction

above)	
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Task 7 – Record Support (PWS Section 3.0, 3.5)

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings, including preparing electronic versions of documents for the Agency’s electronic docket system and preparing non-CBI versions of documents for public release. The contractor shall maintain an index of record materials and deliver the index to the EPA WAM quarterly. Upon written technical direction, the contractor shall deliver record documents to the electronic docket.

In addition, the contractor shall provide support in responding to Freedom of Information Act (FOIA) requests for records. Such support includes researching existing documentation to identify potentially responsive records for the FOIA request and/or any FOIA appeal, and assisting EPA in compiling responsive documents. For purposes of developing the work plan, the contractor should assume that there will be approximately five FOIA requests for which support described above may be required.

TASK 7 – DELIVERABLES	
Deliverable	Due Date
Index of record materials	Quarterly
Identify/compile FOIA-responsive records	By written technical direction
Index of items in the docket for the final rule	By written technical direction
Complete the upload of documents to the docket for the final rule	By written technical direction

Task 8 - Regulatory Support (PWS Section 3.5, 3.6)

Upon written technical, the contractor shall assist EPA in developing and reanalyzing regulatory options and its implementation, based on comments on the proposed regulation provided during the comment period. Technical support under this task shall include preparing text for use in Federal Register preambles, providing technical assistance in developing revisions to the regulations, and assisting in the development of notices of data availability. Tasks may also include providing supporting information and documentation for regulatory option packages, briefings, and selected analyses and data summaries. Deliverables under this task may include quick-response tasks.

TASK 8 – DELIVERABLE	
Deliverable	Due Date
Draft text for inclusion in Federal Register preambles and notices of data availability; draft regulatory text	September 15, 2014
Analysis of regulatory options	By written technical direction

Task 9 – Response to Public Comments (PWS Section 3.5, 3.6, 4.0)

The public comment period for the steam electric ELGs proposed rule ends on September 20, 2013. The contractor shall provide technical support to EPA's efforts to respond to public comments received on the proposed rule. This support may include, but is not limited to, the following activities: reviewing, assessing, and compiling public comments; complete coding of comments and entering them into a database that can be used by all appropriate personnel that will be developing or reviewing comment responses; compiling information that will be used to develop responses to comments; and drafting responses. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments. The contractor shall provide monthly reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses.

TASK 9 – DELIVERABLES	
Deliverable	Due Date
Compile comments (consistent with subject area outline) from key stakeholders (e.g., UWAG, EIP, Earthjustice)	2 weeks following the close of public comment period
Complete comment coding, database entry, and assignments for comment responses	5 weeks following close of public comment period
Draft response to public comments received for proposed rule	By written technical direction
Monthly report of status of comment response activities	Monthly

Guidance Regarding Conferences: No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Attachment A – Improving the Deliverable Review Process

Work Assignment 1-29 involves the production of several types of written products ranging from deliberative memos to published reports. The general work flow is for EPA to provide written guidance to the contractor on the development of these products. The contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The EPA WAM and contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the contractor, and other stake-holders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (*e.g.*, an internal contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

First Draft – An early version of a document that will ultimately be “public-ready”. The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review, particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is reasonable to expect that senior technical review may lead to further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A “public-ready” document that is ready for distribution to an internal audience (*e.g.*, EPA workgroup) or external audience (*e.g.*, EPA's Docket). The contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to write in plain language. Specifically, the technical editor will revise the document to address the following questions.²

² These questions were modified from the following EPA's website: <http://www.epa.gov/plainlanguage/faqs.htm>

- Is the document organized to serve the needs of readers?
- Does the document explain how it is organized and how to use it?
- Does the document start with items of most interest to reader?
- Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- Are complicated topics summarized before describing all the details?
- Does the document use the active voice?
- Does the document include only information readers actually need?
- Does the document use easy-to-read design features like lists, tables, graphics, and “white space”?
- Are citations for references clearly identified and does the reader know how to gain access to these references?

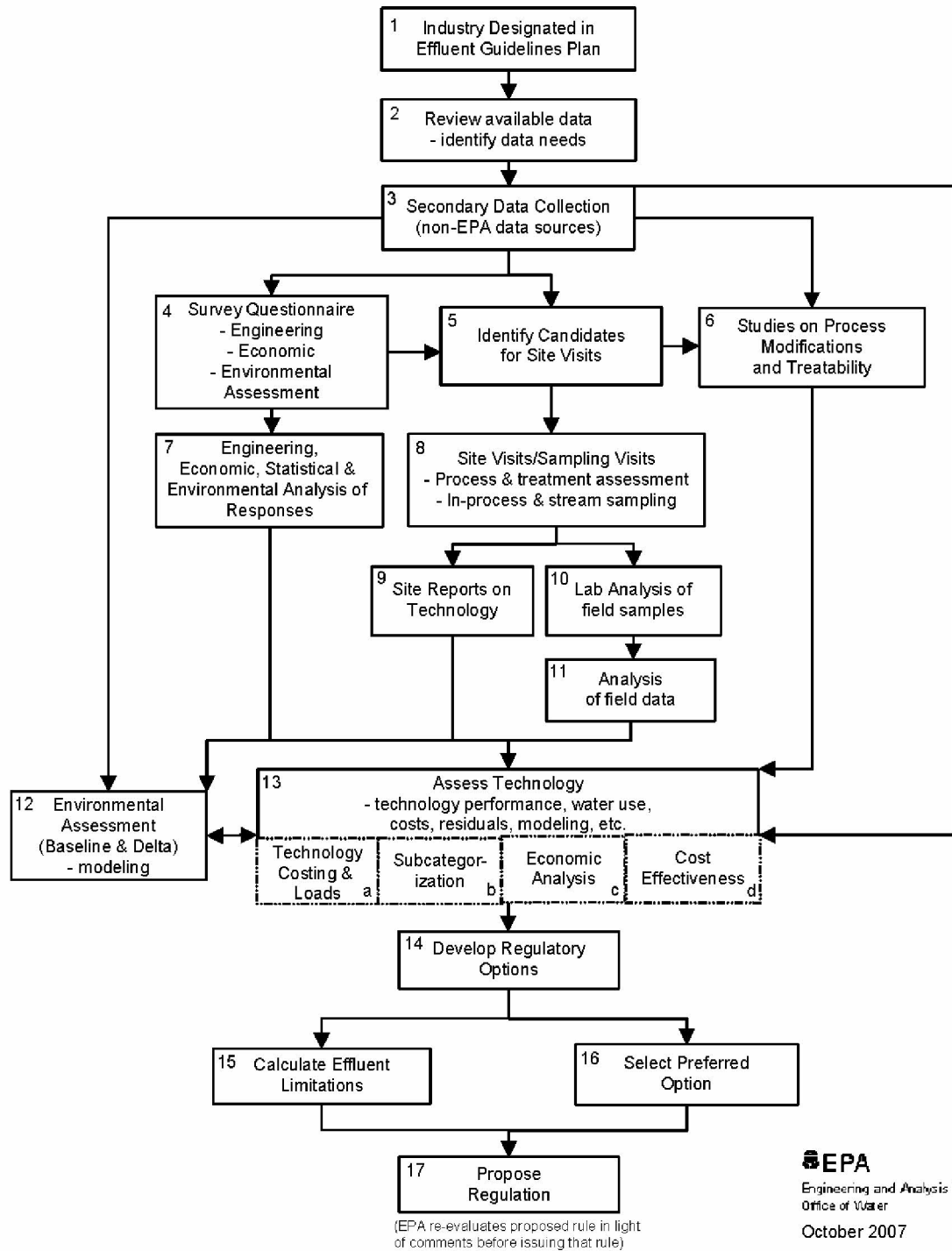
Additionally, the contractor will get approval from EPA on any other style sheets for Draft Final documents.

Clarification of EPA’s Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when senior technical review should take place and the purpose of the review. Specifically, EPA should identify for the contractor the “big-picture” objectives and questions for the senior technical review to address. The review should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The contractor will share with EPA a summary of the review.

Attachment B

Effluent Guidelines Development Process



EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-29			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1		Title of Work Assignment/SF Site Name Steam EEG Reg Support					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2013 To 09/25/2014			
Comments:									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee: \$0.00		LOE: 0					
09/26/2012 To 09/25/2014									
This Action:		\$1,234,010.00		13,020					
Total:		\$1,234,010.00		13,020					
Work Plan / Cost Estimate Approvals									
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Cumulative Approved:		Cost/Fee: \$1,234,010.00		LOE: 13,020					
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						Phone Number 202-566-1003			
						FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:			
						Phone Number: 202-566-1040			
						FAX Number:			
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						Phone Number:			
						FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:			
						Phone Number: 513-487-2352			
						FAX Number:			

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-29				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014			Title of Work Assignment/SF Site Name				
			Base Option Period Number 1			Steam EEG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 09/26/2013 To 09/25/2014					
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Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
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Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE:					
09/26/2012 To 09/25/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name Ronald Jordan							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number 202-566-1003			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
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Other Agency Official Name							Branch/Mail Code:			
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							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 1-29
Amendment 1**

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Ronald Jordan

Alternate Work Assignment Manager: Jezebele Alicea-Virella

Task Manager (Task 4): William Swietlik

Period of Performance: March 27, 2014 through September 25, 2014

Purpose:

The purpose of this Amendment 1 is to increase the level of effort (LOE) for WA 1-29 and to add scope to the environmental assessment work under Task 4.

Under WA 1-29, the contractor is supporting EPA's the development of revised effluent limitations guidelines and standards (collectively referred to as ELGs) for the steam electric power generating point source category (40 CFR Part 423). Amendment 1 includes the following:

Increase the level of effort – due to greater LOE associated with addressing public comments and coordinating analyses under WA 1-29 for the ELG rulemaking with the Coal Combustion Residuals rulemaking being conducted by the Office of Solid Waste and Emergency Response. Due to the litigation status of the Consent Decree deadline for the ELG rulemaking, EPA accelerated the review of public comments review due to an expedited timeframe for the rulemaking.

In addition, EPA received substantially more comments than anticipated (approximately 179,000 comments received) and a number of complex issues were raised in comments, necessitating follow-up with industry and equipment/chemical vendors for additional data and leading to more extensive technical reviews and analyses. In order to meet EPA's deadlines and address the number and complexity of comment issues, the contractor required more resources (i.e. staff and hours) to complete task.

Task 4 directs the contractor to “conduct new/improved analyses or EA methodologies as directed by the WAM in support of the final ELG rule”. As part of such new/improved analyses and methodologies, Amendment 1 directs the contractor to review case studies and incorporate enhanced ecological risk modeling into the risk assessment and case study models developed under approved work plan Task 2.4.4. The outputs of this effort shall be incorporated into the benefits analyses for the revised ELGs.

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-29				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014			Title of Work Assignment/SF Site Name				
			Base Option Period Number 1			Steam EEG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 07/11/2014 To 09/25/2014					
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Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
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Total:										
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Cumulative Approved:				Cost/Fee:			LOE:			
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_____ (Signature) (Date)							Phone Number 202-566-1003			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

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Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2015 Base Option Period Number 1			Title of Work Assignment/SF Site Name Steam EEG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 07/11/2014 To 09/25/2014				
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Total:				\$1,848,132.00				19,242		
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Work Assignment Manager Name Ronald Jordan						Branch/Mail Code:				
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Other Agency Official Name						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number:				
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Contracting Official Name Brad Heath						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2352				
						FAX Number:				

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-29				
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Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2015			Title of Work Assignment/SF Site Name				
			Base Option Period Number 1			Steam EEG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose:					Period of Performance					
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Comments: This Work Plan Approval incorporates Amendment 1.										
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Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
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Total:				\$1,659,704.00				17,342		
Work Plan / Cost Estimate Approvals										
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Work Assignment Manager Name Ronald Jordan						Branch/Mail Code:				
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Project Officer Name Meghan Hessenauer						Branch/Mail Code:				
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Contracting Official Name Brad Heath						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2352				
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EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-30				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1			Title of Work Assignment/SF Site Name AK Seafood Processors				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 03/27/2014 To 09/25/2014				
Comments:										
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Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
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Authorized Work Assignment Ceiling										
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09/26/2012 To 09/25/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
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Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number 202-566-1040			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code:			
							Phone Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							FAX Number:			
							Branch/Mail Code:			
							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 1-30**

Title: Technical Support for EPAs Response to the Industry Petition on ELGs for Non-Remote Alaskan Seafood Processors

Work Assignment Manager (WAM): Meghan Hessenauer, USEPA/OW/OST/EAD, WJC Bldg. E/W Connecting Wing, 6233S, 1200 Pennsylvania Ave., NW (4303T), Washington, DC, 20460. Phone: 202-566-1040. Email: Hessenauer.meghan@epa.gov

Alternate Work Assignment Manager: Wendy Hoffman, USEPA/OW/OST/EAD, WJC Bldg. E/W Connecting Wing, 6233Q, 1200 Pennsylvania Ave., NW (4303T), Washington, DC 20460. Phone: 202-564-8794. Email: Hoffman.wendy@epa.gov

Period of Performance: March 27, 2014 through September 25, 2014

Purpose: The purpose of this work assignment is to outline the tasks for the contractor (ERG) in adherence with the Performance Work Statement of Contract EP-C-12-021. Specifically, ERG shall provide technical support to the Office of Water, Engineering and Analysis Division, Alaskan Seafood Project Team in the development of responses to comments from the Notice of Data Availability (NODA).

Background: Under the Clean Water Act (CWA), EPA establishes national technology-based regulations, known as “effluent limitations guidelines and standards,” to reduce discharges of pollutants from industries to waters of the U.S. In the 1970s, EPA issued an effluent limitation guideline (ELG) establishing limits for seafood processing facilities in Alaska based upon location. The ELGs differentiated between non-remote seafood processing locations and remote seafood processing locations. In “non-remote” locations, the ELGs are based on the screening of the processing solids from the seafood processing wastewaters and disposing of the solids by means other than discharge to navigable waters. In “remote” locations, the ELGs are based merely on grinding of the processing solids to reduce the size of the waste pieces to no greater than ½ inch, which could then be discharged into the navigable waters as a part of the facility’s effluent.

In 1980, EPA temporarily suspended the limits for non-remote regions of Alaska based on a petition from the seafood processing industry to allow EPA to consider new information. During the suspension EPA applied the remote limits based on grinding. In 1981, EPA issued a draft response, proposing to deny most of the petition and requested public comments on that response. EPA also indicated it would continue the suspension until a petition final response was issued. To date, EPA has not issued a final response.

After years of focus on other CWA discharge priorities, in 2010 EPA began the process leading to a final decision on a response to the petition. As a result, EPA recently gathered new data and information and performed supporting analyses to update the 1981 proposal. The recent data demonstrates a significant impact associated with near shore discharges of seafood waste where EPA has suspended the “non-remote” requirements. The primary concern with near shore discharges of seafood processing waste is the formation and persistence of waste piles at the bottom of receiving waters. Near shore piles of fish processing waste cover large areas of the seafloor and contain large quantities of solids that negatively affect receiving water quality. These piles range in area from less than an acre up to tens of acres, and from relatively thin coverage of the bottom up to many feet thick. The waste piles smother benthic communities, deplete dissolved oxygen, and cause other harmful impacts on the aquatic ecosystem. In some cases, large waste piles do not dissipate, even with flushing from tides and strong channel currents. Where discharges have stopped, fish waste piles and their effects can remain for 10 years or more.

As a result of this new information, EPA provided preliminary results of analyses of the updated data and information in the Notice of Data Availability (NODA) dated November 2013. EPA provided preliminary indications of how these results may be reflected in EPA’s final response to petitions submitted in 1980 by certain members of the Alaskan seafood processing industry. In addition to the final response to the petition, EPA may promulgate in final form amended ELGs applicable to certain Alaskan seafood processing discharges. The comment period closes on March 7, 2014.

General Work Assignment Requirement:

Deliverable Formatting and Terminology - Throughout this Work Assignment, ERG shall provide draft and final reports to EPA in electronic and hard copy formats. The EPA WAM and contractor will use the terminology in this work assignment to improve the deliverable review process. ERG shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA Work Assignment Management (WAM) prior to file preparation. The EPA WAM will identify for ERG which documents will be posted on EPA’s Effluent Guidelines webpage. The documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant. For planning purposes, ERG should assume that a Response to Comments document may be posted to the webpage.

Travel – Non-local travel by the contractor employees and/or subcontractors may be required to support the scope of this work assignment. The contractor shall provide specific travel details and costs in a request for travel approval by the EPA WAM and the EPA Project Officer (PO) before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information: ERG will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. ERG will manage all

reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its “Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan,” dated December 5, 2007 or its successor approved plans.

Identification as Contracting Staff - To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public ERG should refer all interpretations of policy to the EPA WAM.

Limitation of Contractor Activities - ERG will submit drafts of all deliverables to the EPA Work Assignment Manager (WAM) for review prior to submission of the final product. ERG will incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. ERG will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.

Deliverables- Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

Deadlines - For the purpose of developing the work plan, ERG shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the EPA WAM, PO, or relevant task manager will change the deliverable deadlines through written technical direction. The EPA WAM/PO also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance.

Conferences, Meetings and Other Events- No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Tasks (PWS Section 4.0):

1) Management of the Work Assignment-

ERG shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. ERG shall also estimate direct costs such as travel, computer costs, typing, etc. The workplan is due to EPA within 30 days of receiving the work assignment.

ERG shall provide electronic copies of a monthly progress reports to the EPA WAM and Alternate WAM. Each progress report shall describe the work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties. Finally, the monthly report should include a discussion of quality assurance progress.

2) Quality Assurance-

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) be in place before any work begins that involves the collection, generation, evaluation, analysis or use of environmental data. This work assignment is a continuation of work previously performed by ERG under WAs 30. A revised draft QAPP was prepared to support this project and is in Attachment A and Appendices. A final QAPP shall be prepared by the EPA WAM and ERG prior to use of new data.

3) Kick-Off Meeting –

ERG shall attend a work assignment kick-off meeting with the AK Seafood Project Team members to exchange information and review the background material for the seafood processing 40 CFR Part 408 ELGs. The WAM shall provide ERG with the date and time of the kick off meeting upon consultation with AK Seafood team members and the ERG team members. The WAM will provide ERG an agenda for this kick-off meeting one week in advance of the meeting. The agenda will include the exchange of all draft and final economic documentation from ERG to EPA, including Confidential Business Information. All economics and environmental benefits information supporting this project under the previous contract (68-C-02-095) and previous WA 30 shall be submitted via electronically to the WAM for transfer to another contractor. EPA Team members along with ERG shall develop a schedule for this project during this meeting. The kick-off meeting shall be held during the workplan development phase.

4) Comment Support –

ERG shall support the EPA AK Seafood team members in developing responses to comments. Responses shall consist of individual comment responses unless there are

major issues or frequently stated comments in which an essay would be more appropriate. A comment response database is not required because there are only eight comments to respond to. The EPA AK Seafood team will code the comments.

5) Analyses Support –

ERG shall provide revised draft results of technical engineering analyses in response to comments if needed to support responses to comments. The EPA WAM will provide written technical direction if analyses support is required.

6) Technical Support –

ERG shall provide technical support to the AK Seafood team for outreach activities with stakeholders to clarify comments if needed. The EPA WAM will provide written technical direction if technical support is required.

7) Record support –

ERG shall maintain and complete an accurate and detailed record that documents all data collected and analyses performed to support this project. Both a non-CBI version, appropriate for submission to the EPA docket and, if necessary, a CBI record containing a complete set of CBI will continued to be maintained. ERG shall regularly update the index listing all CBI and non-CBI materials gathered and submitted for inclusion in the record. The index itself is to be non-CBI and will be transferred to the docket as directed by the EPA WAM. ERG shall also assemble non-CBI record information which can be transferred to the docket when necessary as directed by the EPA WAM. All records must be submitted to the EPA WAM by the end of the period of performance – September 25, 2014.

Deliverables:

Task	Deliverable	Deadline
1	Workplan	Within 30 days of receipt of WA
1	Monthly Progress Reports	Monthly
2	Revised QAPP	Due before new data can be used
3	Schedule	During workplan development.
3	Exchange of Information from Previous Contract Work Assignment	During the kick off meeting or mailed prior to kick off meeting
4	Comment Response Support	Within 30 days for notice to proceed after coding comments
5	Analyses Support	Via Technical Direction
6	Technical Support	Via Technical Direction
7	Record Index	September 25, 2014
7	Docket Support	Via Technical Direction

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-30				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1			Title of Work Assignment/SF Site Name AK Seafood Processors				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance From 03/27/2014 To 09/25/2014				
Comments:										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$0.00		LOE: 0						
09/26/2012 To 09/25/2014										
This Action:		\$40,327.00		400						
Total:		\$40,327.00		400						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 04/17/2014		Cost/Fee: \$40,327.00		LOE: 400						
Cumulative Approved:		Cost/Fee: \$40,327.00		LOE: 400						
Work Assignment Manager Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number 202-566-1040 FAX Number:				
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:				

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-36			
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:			
Contract Number EP-C-12-021		Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1		Title of Work Assignment/SF Site Name DAE Guidelines Reg Support					
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 06/10/2014 To 09/25/2014			
Comments:									
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund </div>									
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.									
SFO <input type="checkbox"/> (Max 2)									
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1									
2									
3									
4									
5									
Authorized Work Assignment Ceiling									
Contract Period:		Cost/Fee:		LOE:					
09/26/2012 To 09/25/2014									
This Action:									
Total:									
Work Plan / Cost Estimate Approvals									
Contractor WP Dated:				Cost/Fee:		LOE:			
Cumulative Approved:				Cost/Fee:		LOE:			
Work Assignment Manager Name Damon Highsmith <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number 202-566-2504 FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between; border-top: 1px solid black; margin-top: 10px;"> (Signature) (Date) </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 1-36**

Title: Dental Amalgam Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Damon Highsmith
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6231T
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Phone: 202-566-2504
FAX: 202-566-1053
E-mail: highsmith.damon@epa.gov

Period of Performance: June 10, 2014 through September 25, 2014

Background:

EPA has prepared a proposed effluent guideline rulemaking for dental facilities to reduce discharges of mercury to the environment. The agency focused its technology assessment on amalgam separators. The rule is currently being prepared for submission to OMB for review. EPA expects to publish the rule in late 2014.

Across the United States, many states and municipal wastewater treatment plants (publicly owned treatment works (POTWs)) are working toward the goal of reducing discharges of mercury to POTWs.

Mercury is a concern to human health because it is a persistent bioaccumulative toxic element. Many studies have been conducted in an attempt to identify the sources of mercury entering these POTWs. According to the 2002 Mercury Source Control and Pollution Prevention Program Final Report prepared for the National Association of Clean Water Agencies (NACWA), dental clinics are the main source of mercury discharges to POTWs. A study funded by the American Dental Association (ADA) estimated in 2003 that 50 percent of mercury entering POTWs was contributed by dental offices. EPA estimates that dentists discharge approximately 4.4 tons of mercury each year to POTWs. EPA estimates there are approximately 160,000 dentists working in over 120,000 dental offices that use or remove amalgam in the United States – almost all of whom discharge their wastewater exclusively to POTWs.

Mercury-containing amalgam wastes may find their way into the environment when new fillings are placed or old mercury-containing fillings are drilled out and waste amalgam materials that are flushed into chair-side drains enter the wastewater stream. Some of the waste amalgam particles that reach the sewer system settle out in the sewers, and some are carried to POTWs. The physical processes used in POTWs remove about 90% of the

mercury received in wastewater. The mercury removed from wastewater then resides in the biosolids or sewage sludge generated during primary and secondary treatment processes.

EPA conducted a study of this industry as part of its 2006 Effluent Guidelines Plan. The Health Services Industry Detailed Study Report for Dental Amalgam (EPA-821-R-08-014) was completed in August 2008 (see http://water.epa.gov/lawsregs/lawsguidance/cwa/304m/upload/2008_09_08_guide_304m_2008_hsi-dental-200809.pdf.) Among other things, the 2008 study provided a profile of the industry, information on types and effectiveness of amalgam separators available, information on mercury discharges from dental facilities and, information on existing state and local amalgam separator requirements.

The contractor shall provide technical support and expertise for a variety of regulatory development activities. Support may include, but is not limited to, estimating pollutant discharges, analyzing the performance of amalgam separators, preparing briefings and outreach materials, and conducting other similar technical analyses that fall within the contract Statement of Work.

Throughout this Work Assignment, the contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WAM prior to file preparation.

Travel - EPA does not anticipate the need for non-local travel by the contractor employees and/or subcontractors to support the scope of this work assignment.

Confidential Business Information - The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the Office of Science and Technology Confidential Business Information (OST-CBI) Application Security Plan (August, 2011), or its successor approved plans. See Task 4 for more details.

Meetings - To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties or visiting field sites.

Limitation of Contractor Activities - The contractor shall submit drafts of all deliverables to the WAM for review prior to submission of the final product. The contractor shall incorporate all WAM comments into all final deliverables, unless otherwise agreed upon by the WAM. The contractor shall adhere to all applicable EPA management control procedures as implemented by the Contracting Officer (CO), Project Officer (PO), and WAM.

Task 1 – Program Management:

The contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. The contractor shall also estimate direct costs such as travel, computer cost, typing, etc.

The contractor shall prepare and deliver monthly progress reports to the WAM and PO. These reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The contractor shall inform the Contracting Officer, Project Officer, and the Work Assignment Manager in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

TASK 1 – DELIVERABLES	Due Date
Work Plan	• In accordance with contract requirements
Progress Reports	• Monthly

Task 2 – Records Management (PWS Section 3.6):

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings. The contractor shall contact the Office of Water Docket to ensure that the record shall meet the docket's requirements including any E-Docket requirements. This includes preparation of electronic versions of documents for the Agency's E-Docket system. The index of rulemaking record materials shall be submitted to the WAM quarterly. The record documents and index are to be delivered to the WAM at the completion of the work assignment, or when directed by the WAM in writing. Finally, the contractor shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WAM with relevant information from the record to be used in the Agency's response to the FOIA) as directed in writing by the WAM.

TASK 2 - DELIVERABLES	Due Date
Maintain both the paper and the electronic the records	• Ongoing throughout the period of performance
Submit index of record materials to WAM	• Quarterly
Submit record index	• September 25, 2014 or upon written technical direction from the WAM
Briefing / FOIA Support	• Ongoing throughout the period of performance by written technical direction.

Task 3 – CBI Procedures (PWS Section 3):

During the course of the work assignment, the contractor may be accessing and evaluating CBI. As such, the contractor shall adhere to EPA's CBI policy and procedures

as described in the contract statement of work, Section 3. The contractor shall obtain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements). The contractor shall utilize CBI information in accordance with contract requirements and limitations to include using the Office of Science and Technology Confidential Business Information (OST-CBI) Application Security Plan (August, 2011) or its successor approved plans.

Task 4 – General Technical Support (PWS Section 3):

Using information provided by the WAM, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses as directed by the WAM through written technical direction. The tasks may include work such as support in preparing or gathering data for presentations at conferences, summarizing data to brief management, or preparing materials and participating in meetings, conferences and workshops to support EPA’s outreach activities to the public and industry. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there shall be approximately three written technical directives.

TASK 4 – DELIVERABLE	Due Date
General technical support (as above)	• by written technical direction

Task 5 – Technical Development Document (PWS Section 3.6):

The contractor shall build upon the draft Technical Development Document, developed under WA 8-36 of contract 68-C-02-095, for this industry. The contractor shall use information collected in the Health Services Industry Detailed Study Report for Dental Amalgam (EPA-821-R-08-014) in developing the document. Information from the detailed study shall be updated to draft this technical development document as directed in written technical direction from the WAM. The contractor also shall incorporate information from the economic assessment and environmental assessments, both of which shall be provided to the contractor.

TASK 5 – DELIVERABLES	Due Date
Draft TDD for proposal	• by written technical direction
Final TDD for proposal	• by written technical direction

Task 6 – Quality Assurance (PWS Section 3.1):

Quality Assurance Project Plans are required under the Agency’s Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1A2 and implementing guidance CIO-2105-P-01-0. All projects that involve the generation, collection, analysis and use of environmental data shall have an approved QAPP prior to the commencement of the work.

QA Project Plan Requirements

EPA policy requires that an *approved* Quality Assurance Project Plan (QAPP) be in place before any work begins that involves the collection, generation, evaluation, analysis or use of environmental data. This work assignment is a continuation of work previously performed by the contractor under WA 8-36 of contract 68-C-02-095, and a QAPP was already prepared and approved by EPA to support work performed to support this project.

This continuation work assignment includes work to support the Steps 13, 14, 15, 16 and 17 that were not included in the effluent guidelines development process that were not included in the precursor to this Work Assignment. To ensure that all activities performed under this work assignment are compliant with EPA's quality system requirements, the Contractor shall adhere to the previously approved QAPP *and*:

- The Contractor shall review the previously approved QAPP to verify that the QAPP adequately documents how quality assurance (QA) and quality control (QC) shall be applied to all activities to be performed under this work assignment, including the new steps in the effluent guidelines development process listed above. As part of this review, the Contractor shall also verify that existing QAPP content (e.g., organizational charts, roles and responsibilities, QA/QC procedures, checklists, SOPs, etc.) are still appropriate for the work to be performed under this work assignment for previously identified steps in the effluent guidelines process that shall continue to be supported under this work assignment. In addition, the contractor shall verify that the QAPP:
 - Addresses all activities involving the **generation** (including field studies, laboratory studies, and modeling output), **collection** (including surveys, literature searches, and third party data), **evaluation** (including data inspection, review, assessment, and validation), **analysis** (including statistical, engineering, and economic analysis and testing, evaluation, and validation of methods and models) **and use of data** to support EPA decisions, regulations, policy, publications or tools (including effluent guidelines, methods, criteria, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs). Examples of data include, but are not limited to, wastewater sample analysis results, flow measurements or data, facility questionnaire data, economic data, use of models, secondary data (including sources and the acceptance criteria), any software and database management requirements and any other relevant work that might affect the quality of the data. Note that QAPPs are also required for the development or revision of models and software that support the generation, collection, evaluation, analysis or use of data. For example, when existing models are used as a tool to generate or evaluate data, the project QAPP shall describe the model, how it shall be used, and how the model output shall be evaluated to ensure it meets the overall quality objectives for the project. However, development or revision of new models also shall be supported by a QAPP that describes the objectives for the model, the quality criteria that shall be applied to the model, and the procedures for evaluating whether the model meets those criteria.

- Provides enough detail to clearly describe objectives of the project supported by the work assignment; the type of data to be collected, generated, or used under this work assignment to support the project objectives; the quality objectives needed to ensure that these shall support the project objectives; and the quality assurance and quality control activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.
- Includes specific performance criteria and measures that shall be used to verify that data generated, collected or used in this work assignment meet those criteria. If a database or other electronic tool (e.g., model, spreadsheet, etc.) shall be created for the project, the QAPP shall describe how the database or electronic tool shall be documented (e.g., data element dictionary, user manual, SOP, or other means appropriate for the project), the controls to ensure accurate data entry (when data from another source are manually entered into the database), data transfer (when data are transferred from one electronic medium to another), or data merging (when data from multiple databases or electronic media are merged into a single database).
- Explicitly references tools, such as SOPs, checklists, and guidelines that the contractor shall use in the project to document data quality. The QAPP shall include the tools as attachments for EPA's review and acceptance.
- Addresses the following “general questions that are applicable to all QAPPs that support EAD effluent guidelines projects”:
 - What is the objective/goal of this effort?
 - What are the roles and responsibilities of staff who shall support this project, and how to they relate to the specific key steps
 - What training and competency requirements are necessary for key personnel that shall support the project?
 - If models shall be used to support the project, what are these models, why have they been selected, and how shall they be validated, documented, and used?
 - What are the SOPs, tools and checklists that shall be used?
- Addresses the following questions related to Steps 13, 14, 15, 16 and 17 that were not included in the effluent guidelines development process that were not included in the precursor to this Work Assignment.

Specific questions shall be identified by the WAM during work plan review, and communicated to the contractor via written technical direction.

- If **minor** changes are needed to the existing QAPP, the Contractor shall submit a revised QAPP to EPA within 10 days after submittal of the work plan. This revised QAPP shall include a version history page that summarizes the changes made. The Contractor also shall provide EPA with copies of any modified SOPs or checklists. EPA shall review the revised QAPP and provide the Contractor with written approval or comments within 15 days of receiving the Contractor's submission. The Contractor shall revise the submitted QAPP within 7 days of receipt, unless otherwise instructed by the WAM.

- If **major** changes are needed to the existing QAPP, the Contractor shall submit a revised QAPP to EPA within 15 days after submittal of the work plan. When preparing this revised version, the Contractor shall ensure that it is written in an active voice and shall include a version history page that summarizes changes made. The Contractor also shall provide EPA with copies of any modified SOPs or checklists. EPA shall review the revised QAPP and provide the Contractor with written approval or comments within 15 days of receiving the Contractor's submission. The Contractor shall revise the submitted QAPP within 10 days of receipt, unless otherwise instructed by the WAM.
- **Under no circumstances shall work that involves the generation, collection, evaluation, analysis, or use of environmental data be performed without an approved QAPP in place 50 days after submission of the Contractor's work plan.**
- Under no circumstances shall field sampling or laboratory analysis activities be conducted prior to receipt of an approved work plan.
- Any non-sampling/non-analytical work that involves the generation, collection, evaluation, analysis, or use of environmental data that is initiated prior to approval of the Contractor's QAPP shall be performed in accordance with the approved QAPP. (The QAPP requirements shall be applied retroactively to this period that lasts no more than 50 days from submission of the Contractor's work plan.).

Data Quality Act/Information Quality Guidelines Requirements

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket or record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency* (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" shall be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors shall indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the

Contractor designates as confidential so that the WAM can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WAM, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the WAM shall notify the Contractor through written technical direction.

Additional QA Documentation Required

In addition to the QAPP requirements described above, all major deliverables (e.g., Technical Support Documents, Study Reports, Study Plans, etc.) produced by the Contractor under this work assignments shall include a discussion of the QA/QC activities that were or shall be performed to support the deliverable. For example, a Technical Support Document or Study Report shall include a clear discussion of the quality management strategies that were employed to control and document the quality of data generated and used.

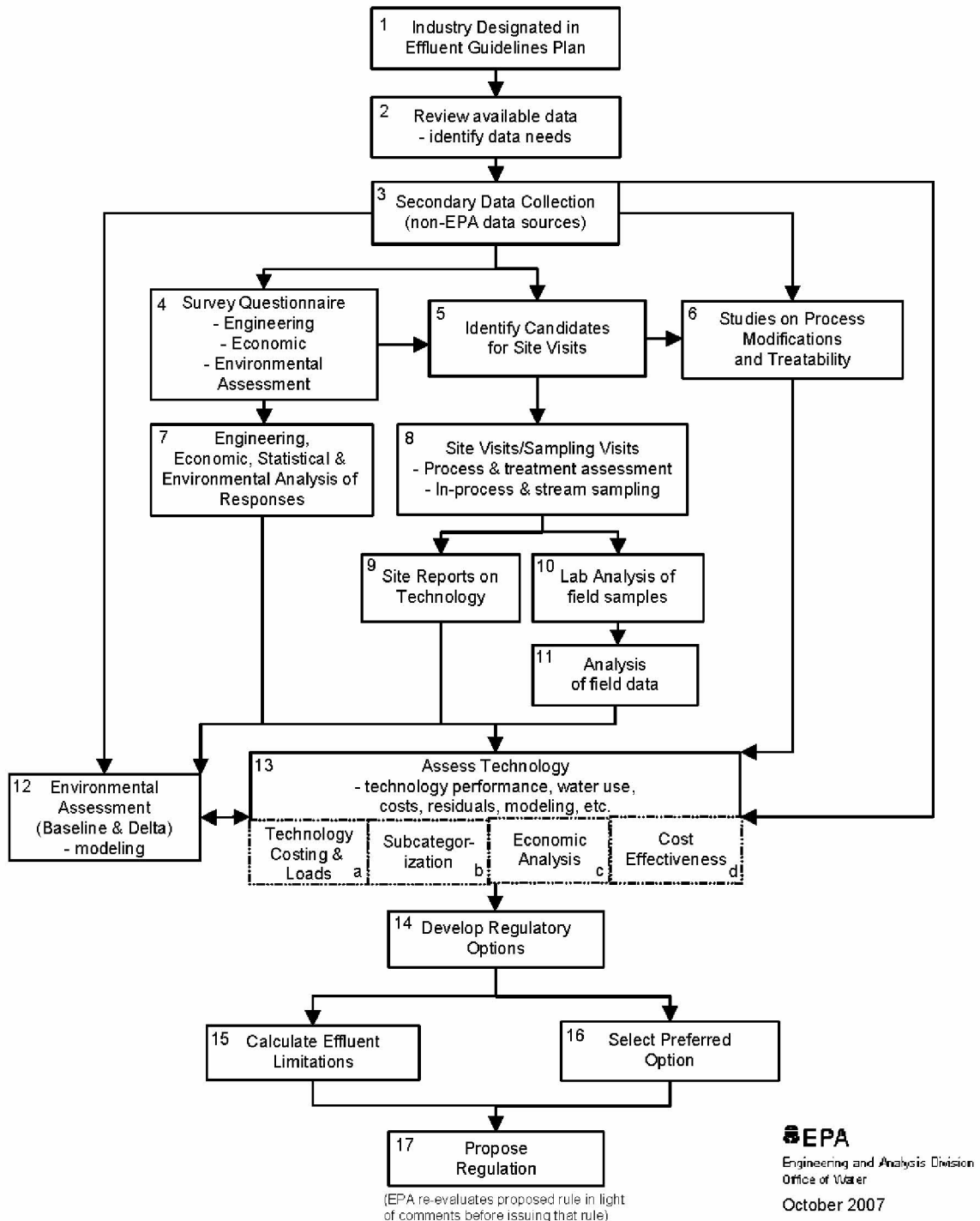
The contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the contractor may include this as a part of the contract-required monthly financial/technical progress report.

Deliverables and schedule for Task 6:

- QA Plan: If minor revisions are determined to be necessary, a revised QAPP shall be submitted within 10 days after submittal of the Contractor's work plan. If major revisions are determined to be necessary, a revised QAPP shall be submitted within 15 days after submittal of the Contractor's work plan.
- If required by WAM, the Contractor shall revise the QA plan within 7 days of receipt of comments from the WAM (for a QAPP with minor revisions) or within 10 days of receipt of comments from the WAM (for a QAPP with major revisions), unless otherwise directed by the WAM
- Monthly reports of QA work performed (may be included in the Contractor's monthly progress report.)

Attachment C
Effluent Guidelines Process Flowchart & QA
Questions to be Asked at Each Step of the Process

Effluent Guidelines Development Process



EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 1-36				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2014 Base Option Period Number 1			Title of Work Assignment/SF Site Name DAE Guidelines Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance From 06/10/2014 To 09/25/2014				
Comments:										
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund </div>										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$0.00				LOE: 0				
09/26/2012 To 09/25/2014										
This Action:		\$39,882.00				435				
Total:		\$39,882.00				435				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 07/07/2014		Cost/Fee: \$39,882.00				LOE: 435				
Cumulative Approved:		Cost/Fee: \$39,882.00				LOE: 435				
Work Assignment Manager Name Damon Highsmith <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number 202-566-2504 FAX Number:				
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:				